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July 8, 2011

US Environmental Protection Agency
Region 5
2525 N. Shadeland Avenue
Indianapolis, IN 46219

Attention: Ms. Shelly Lam

Reference: West Vermont Street Drinking Water Site
Speedway, Indiana; Site ID#B5UJ

Dear Ms. Lam:

We write on behalf of Allison Transmission, Inc. (ATI) in connection with the West Vermont Street Drinking Water Site (the Site).

During the June 16, 2011 meeting regarding the Site, USEPA Region 5 invited all participants to submit comments regarding the March 27, 2011 Weston Solutions *Technical Memorandum Analytical and Hydrogeological Evaluation* (TM) and other data associated with the Site. In this letter, we provide comments regarding the TM, with additional discussion of the information we presented at the June 16, 2011 meeting demonstrating that ATI's facility, located at 4700 West 10th Street, Indianapolis, Indiana 46222 (ATI Facility), has no nexus to the Site. As discussed below, the data conclusively demonstrate that the ATI Facility is not a source and that ATI is not a potentially responsible party (PRP).

A. General Motors' Sampling Data Demonstrate the ATI Facility Is Not a Source of Contamination at the Site

As discussed during the June 16 meeting, General Motors (GM) performed additional sampling in connection with its RCRA Facility Investigation at the ATI Facility. GM's sampling was performed specifically to address EPA's questions regarding the ATI Facility's potential nexus to the Site. We respectfully submit that GM's sampling has answered those questions.

GM has performed the following investigations that are pertinent to this issue: the General Motors, Allison Transmission RCRA Facility Investigation, dated February 20, 2009 (GM RFI); Stage II and Stage III Additional Sampling Data Reports dated March 26 and June 19, 2009; and Supplement Number 2 to RCRA Facility Investigation: Vermont Street Investigation dated May 2010. These extensive groundwater investigations at and around the ATI Facility (including adjacent to the Site) demonstrate that there is no current or historical groundwater data suggesting a vinyl chloride (or other chlorinated solvents) release from the ATI Facility which could affect the Site.

In June 2011, GM sampled adjacent to (and up-gradient from) the Site, including four locations along Michigan Street, which forms the northern up-gradient border of the Site. The groundwater preliminary laboratory analytical data from GM's sampling reveal that no vinyl chloride contamination was identified in the water-bearing zones at any depth, meaning that no plume exists connecting the ATI Facility with the Site. *See* Attachment 1 (Arcadis draft Drawings 1 and 6; Drawing 6 is the cross-section along Michigan Street from Grande Avenue to the east side of the Michigan Plaza Site showing recent data).

As shown on the Arcadis investigation summary (Drawing 1) and cross-section along Michigan Street (Drawing 6), the only vinyl chloride detections are present to the east of the ATI Facility at the Michigan Meadows Apartments and Michigan Plaza Site (MPS), where deeper groundwater has not been investigated by the responsible parties. Furthermore, as discussed below, a commingled vinyl chloride plume is migrating to the Site from sources at the MPS and the Genuine Parts Site (GPS). Simply put, the evidence shows that the ATI Facility is not a source of vinyl chloride groundwater contamination at the Site.

B. Comments to the Technical Memorandum Analytical and Hydrogeological Evaluation, prepared on behalf of the USEPA, dated March 27, 2011, by Weston Solutions

1. Monitoring Wells Are Present in the Residential Area

The TM indicates no monitoring wells are located in the residential area south of the ATI Facility. That is not correct. Seven GM installed wells are present (as shown in the GM RFI Figure 3.4.1), four of which are screened in the intermediate water bearing zone (S2). As noted above, the wells were recently (June 2011) sampled and preliminary laboratory analysis did not identify any vinyl chloride (See Attachment 1, Drawing 1).

2. Regional Groundwater Flow Direction Is Not Affected by Pumping at the ATI Facility

Regional groundwater flow direction has been used as a basis for presenting an argument as to parties that may be responsible for groundwater impacts at the Site. The TM identifies a flow direction in both the Upper Water Bearing Zone (UWBZ) and Intermediate Water Bearing Zone (IWBZ) which are predominantly to the south southwest, with a much greater westerly flow component in the Lower Water Bearing Zone (LWBZ), based on an USEPA October 2010 monitoring well gauging event. The TM further states that the flow system in the UWBZ and IWBZ is controlled by a variety of influences, including variable geologic setting, groundwater removal from remediation, and production and private pumping wells.

The TM specifically states that GM groundwater remediation pumping at the ATI Facility is an influence to flow direction. However, the groundwater remediation systems at the ATI Facility were designed to influence an area of approximately 70-90 feet laterally from each well and do not have the ability to affect the down gradient or side gradient neighborhood area, which is approximately 600 feet side gradient and approximately 1,000 feet down gradient from the GM groundwater remediation systems.

Additionally, the TM states that "[t]he remedial treatment system located west of the residential properties may also be influencing groundwater flow in the area." This system is screened in the UWBZ and thus does not have an effect on the IWBZ.

Our understanding (and accurate depiction) of the deeper water-bearing zones has been demonstrated at the ATI Facility and between the ATI Facility and the Site. Such an understanding, however, is lacking and has not been demonstrated at and between the GPS-MPS source area[1] and the Site. As noted below, however, that issue does not pertain to ATI insofar as the data exclude the ATI Facility as a potential source of contamination at the Site.

3. Co-Depiction of Vinyl Chloride Plumes on One Figure Shows Impact from Source Area

The TM uses data from the three facilities and the Site on common figures to present isocontours for tetrachloroethene (PCE), trichloroethene (TCE) and cis-1,2-dichloroethene (DCE). Vinyl chloride contamination in groundwater is depicted separately for the three facilities and the Site in TM figures 15B and 15C, Vinyl Chloride Isocontours- Intermediate Water Bearing Zone, and Vinyl Chloride Isocontours Residential Area- Intermediate Water Bearing Zone, respectively. The two separate figures suggest two separate groundwater contamination plumes. This is inaccurate and misleading. As discussed during the June meeting, an accurate depiction reveals a single plume that originates from the MPS and/or GPS, and not from the ATI Facility.

As depicted on the Payne Firm-prepared figure that ATI presented at the June 16 meeting, when the TM figures are geospatially co-located in a single figure, the isocontours intersect, indicating the plumes are, in fact, a single areal plume emanating from the Genuine Parts and/or Michigan Plaza sites. See Attachment 2 (Figure 1 Overlay of Figures 15B & 15C and Figure 2 VC Isocontours Residential Area-Intermediate Water Bearing Zone). It is unclear how the TM could have missed this elementary point, but it clarifies what the evidence reveals – namely, that the plume originates from the MPS and/or GPS. Moreover, a distinct westward migration of the plume into the residential well field is evident. Again, the single plume with a westward migration toward the Site demonstrates that the impacts to the Site do not originate at all from the ATI Facility.

4. Local Groundwater Flow Has Many Specific Influences

The vinyl chloride groundwater contamination in the affected neighborhood and areas to the east is a localized issue with local influences to groundwater flow direction, not the least of which is the existence of up to twenty-five residential water wells. Additionally, hydrogeologic features exist relative to Little Eagle Creek to the east of the Site, and based on GM-reported information on stream basal elevations considered to be a losing stream (i.e., in this case providing potential hydraulic influence toward the Site), and Big Eagle Creek to the west of the Site intersecting the groundwater potentiometric surface, being a gaining stream (i.e., in this case providing potential hydraulic influence away from the Site).

[1] Indiana Department of Environmental Management (IDEM), June 22, 2011 Comment Letter regarding deficiencies in the investigation of the MPS

Furthermore, the topographic feature in which Big Eagle Creek turns sharply to the south directly west of the Site, which further locally influences a westerly component of the groundwater flow direction.

Groundwater contamination, including chlorinated solvents and vinyl chloride, has been previously identified and associated with the MPS and the GPS and is present to the adjacent east of the Site. Vinyl chloride plume mapping in the IWBZ clearly identifies (1) a distinct contaminant plume associated with the MPS and/or the GPS, which, due to local influences on groundwater flow direction, has affected the Site, and (2) that the ATI Facility is not associated with the identified plume.

In addition, the TM discusses the potential sources of contamination at the Site and indicates relative to the ATI Facility that groundwater flow to the east and west is likely not affected by remedial groundwater pumping systems at the ATI Facility. However, the TM presents a speculative theory that residual contamination not captured by current groundwater remediation systems prior to off-site migration could be impacting the Site drinking water now. As discussed above, however, the plume delineation data clearly show un-impacted groundwater both east and south of the ATI Facility, including locations along Michigan Street forming the northern border of the Site. The TM's speculative theory about contamination migrating 1,000 feet to the south with no detected residual impacts is not supported by the science and contradicted by the data.

5. Other Potential Sources Discussed in the TM

Known contamination at the GPS and the MPS, which is the closest source to the Site, was discussed in the TM relative to the impacts at residential wells at the Site. The GPS and MPS are located northeast and east of the Site and are separated from each other by Little Eagle Creek; however, the chlorinated contamination from both sites have commingled beneath the MPS and migrated beyond the respective properties creating a groundwater plume that is at least 2,000 feet long and 500 feet wide. The data cannot reasonably be disputed on that point.

The GPS monitoring well MW-170D is located approximately 100 feet from the Site and has significant vinyl chloride contamination originating from both the GPS and MPS. Consultants for the GPS (Environ) and MPS (Mundell) deny that impacts to residential wells at the Site are from their respective sites. Both consultants consider the elevated concentrations of vinyl chloride at MW-170D (located between the Site and the MPS source areas) as "anomalous," apparently because elevated concentrations of vinyl chloride are present without other detected contamination and the location of the monitoring well does not fit within their conceptual model of contaminant migration from the GPS and MPS. If there is any question about the data, however, it relates solely to how much of the plume is MPS' responsibility, and how much of the plume is GPS' responsibility. The data conclusively show that the plume originates from one or both of their sites.

CONCLUSION

For the reasons set forth above, the evidence demonstrates that the ATI Facility is not a source of groundwater contamination identified at the Site and that ATI is not a PRP at the

Site. The evidence establishes that the source originates at the MPS and/or GPS facilities, although data gaps exist as to the exact nature of the two identified sources and the roles they play in the migration of the commingled MPS and GPS groundwater contamination plumes.

Sincerely,

The Payne Firm, Inc.

John G. Houser, L.P.G.	Michael L. Woodruff, L.P.G.	John L. Payne, P.E.
Senior Project Manager	Senior Consultant	Principal

cc: Tom Nash USEPA
Don Heller USEPA
Erin Brittain IDEM
Pam Thevenow Marion County

Attachments:

Attachment 1: Arcadis Drawings 1 and 6
Attachment 2: Payne Figures 1 and 2
Figure 1 Overlay of Figures 15B & 15C
Figure 2 VC Isocontours Residential Area-Intermediate Water Bearing Zone

References:

Technical Memorandum Analytical and Hydrogeological Evaluation report prepared on the behalf of the USEPA by Weston Solutions dated, March 27, 2011

Technical Response to the General Notice of Potential Liability Letter West Vermont Drinking Water Site prepared on behalf of Michigan Plaza (Aimco Michigan Meadows Holdings, LLC ("AMMH")) by Mundell and Associates, Inc., dated May 9, 2011

Push Probe Investigation near MW-170D letter to Indiana Department of Environmental Management prepared on behalf of the Genuine Parts Company by ENVIRON, dated June 2, 2011

Allison Transmission RCRA Facility Investigation, prepared on behalf of General Motors, by Arcadis, dated February 20, 2009

Stage II Additional Sampling Data Reports prepared on behalf of General Motors, by Arcadis dated March 26, 2009

Stage III Additional Sampling Data Reports prepared on behalf of General Motors, by Arcadis, dated June 19, 2009

Supplement Number 2 to RCRA Facility Investigation: Vermont Street Investigation Data Report, prepared on behalf of General Motors, by Arcadis, dated May 2010

ATTACHMENT 1

Preliminary Draft - For Discussion Purposes Only

MW-0526-S2A
Screened 21-31 ft bgs
LNAPL Present, No Sample Collected
Sampled MW-0623-S2A instead

MW-0526-S2B
Screened 32-42 ft bgs
No VOCs detected (6/6/11)

MW-0623-S2A
Screened 24-29 ft bgs
No VOCs detected (6/6/11)

MW-0525-S2
Screened 17.5-27.5 ft bgs
No VOCs detected (6/6/11)

MW-1102-S4
Boring advanced to 103 ft
No S3/S4 identified
Set well at 93-103 ft bgs (S4)
Chloroform* - 4.3J ug/L, no other VOCs detected (6/13/11)

MW-1101-S4
Boring advanced to 105 ft
No S3/S4 identified
Set well at 92-97 ft bgs (S4)

MW-0522-S2A
Screened 18-28 ft bgs
No VOCs detected (6/2/11)

MW-0522-S2B
Screened 34-44 ft bgs
No VOCs detected (6/2/11)

MW-0524-S2A
Screened 17-27 ft bgs
No VOCs detected (6/2/11)

MW-0524-S2B
Screened 32-42 ft bgs
No VOCs detected (6/2/11)

MW-1003-S3
Screened 50-55 ft bgs
No VOCs detected (6/2/11)

MW-1103-S3/S4
Boring advanced to 105
Bedrock at 96.25
Set well at 85-95 ft bgs
No VOCs detected (6/13/11)

MW-1104
Boring advanced to 85.5 ft
Bedrock at 85.5
No saturated sand identified below terminus of SB-64-1006
No well set

SB-64-1001
Screened 30-35 ft bgs
No VOCs detected (6/6/11)

MW-1105-S3/S4
Boring advanced to 95 ft
Set well at 70-75 ft bgs
Borehole water sample (85-90 ft) (6/6/11)
Chloroform* - 57.5 ug/L, no other VOCs detected
Groundwater sample (6/13/11)
No VOCs detected

SB-64-1006
Screened 32-37 ft bgs
No VOCs detected (6/6/11)

AOI-36
AOI-37
AOI-38
AOI-39
AOI-40

NORTH STREET
COSSELL ROAD
LYONS AVENUE
MICHIGAN STREET
RYBOLT AVE.
4032 Cossell Road
4018 Cossell Road
4012 Cossell Road
4019 Cossell Road
4017 Cossell Road
4042 W. Vermont Street
4044 W. Vermont Street
4046 W. Vermont Street
4060 W. Vermont Street
4018 W. Vermont Street
4140 W. Vermont Street
4130 W. Vermont Street

LEGEND
- SOIL BORING
- GM MONITORING WELL
- OFF-SITE MONITORING WELL OR SOIL BORING
- RESIDENTIAL WATER WELL
- PROPOSED MONITORING WELL LOCATION

NOTES:
- Groundwater sample collected in S2A
- Groundwater sample collected in S2B
- Groundwater sample collected in S3
- Groundwater sample collected in S3/S4 or S4

*Chloroform is commonly identified in drilling water obtained from municipal sources

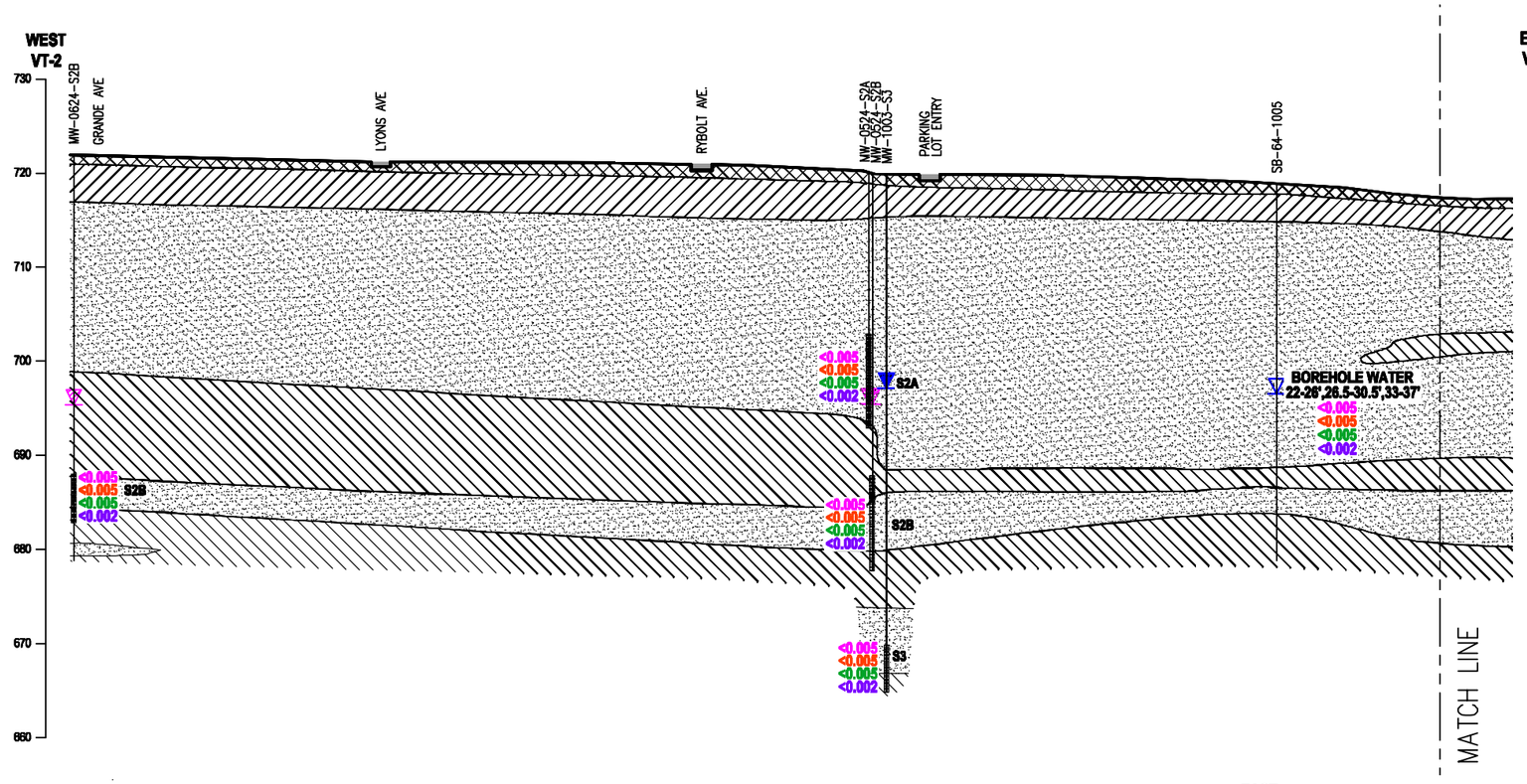
200 0 200
Approximate Scale In Feet

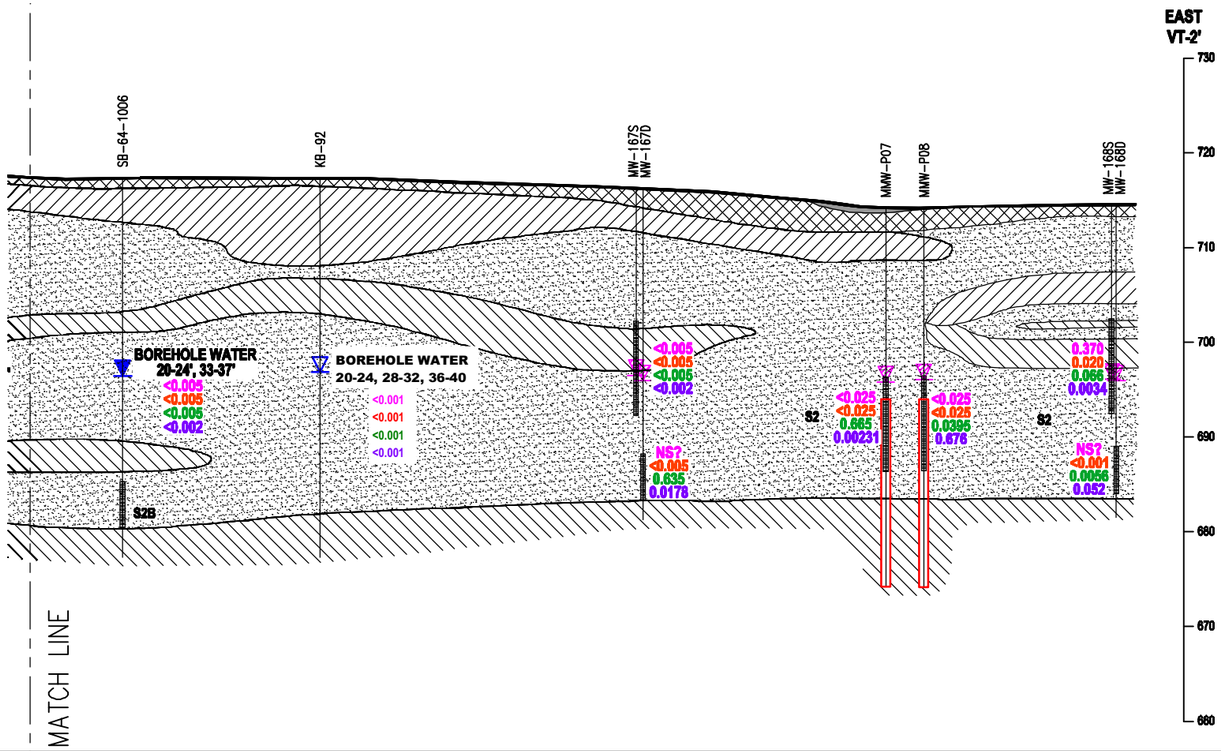
GENERAL MOTORS LLC
ALLISON TRANSMISSION, INC.
SPEEDWAY, INDIANA

JUNE 2011
MONITORING WELL LOCATIONS

ARCADIS

DRAWING 1





LEGEND:

- ASPHALT/CONCRETE
- FILL/TOPSOIL
- PLASTIC CLAY
- SAND
- TILL
- MONITORING WELL SCREENED INTERVAL
- BLANK DRILLED (NO LOGGED LITHOLOGY)
- DEPTH TO WATER DATA (10/14/10) BY EPA
- DEPTH TO WATER DATA (10/15/10) BY ARCADIS
- DEPTH TO BOREHOLE WATER DATA (DATE INSTALLED)
- **S2A/S2B/S3** SATURATED SAND UNIT ID
- <0.005 PCE CONCENTRATION (µg/L)
- <0.005 TCE CONCENTRATION (µg/L)
- <0.005 CIS-1,2-DCE CONCENTRATION (µg/L)
- <0.002 VC CONCENTRATION (µg/L)

NOTES:

1. KB-89, KB-90, KB-91 USED SURFACE GROUND ELEVATION OF MW-158.
2. KB-92 USED SURFACE GROUND ELEVATION OF SB-64-1006.

0 16' 32'
VERTICAL SCALE

0 160' 320'
HORIZONTAL SCALE
V.E. 10X

GENERAL MOTORS LLC
ALLISON TRANSMISSION, INC.
SPEEDWAY, INDIANA

CROSS SECTION VT-2 - VT-2'

ARCADIS

DRAWING 6

ATTACHMENT 2

G:\GIS Projects\GIS Phase I Figure ln\FIGURES\533.42\08\533.42.08_FIG1_OverlayFigures15B15C.mxd

AOI-19
AOI-27
AOI-26
AOI-28
AOI-25
AOI-32
AOI-31
AOI-51

MW-0202-S3
ND
MW-0210-S3
ND
MW-S3-0601
ND
MW-S3-0501
2.5
MW-0419-S3
ND
ND
MW-0421-S3
ND

MW-302
ND
MW-165D
190
MW-166D
265
MW-13D
260
MMW-14D
84.9
MMW-11D
5.2
MW-168D
128
MW-167D
24.9
MMW-P-10D
2130
1000
MW-170D
128
MMW-P-03D
287
MMW-P-09D
111

4012 COSSELL
13
4031 COSSELL
ND
4018 W. VERMONT
1.6
10
ND
4140 W. VERMONT
2.1
4042 W. VERMONT
ND
ND
10
100

Olin Park
N Holt Rd
Olin Ave
Grande Ave
N Lyon Ave
N Ryboll Ave
Tomlinson Dr
W North St
W Walnut St
N Luett Ave
N Livingston Ave
N Somerset Ave
N Rochester Ave
W Michigan St
Cossell Rd
Arthur Ave
W Vermont St
Wilcox St
Indianapolis

N

Legend

- GM Allison Transmission Plant Boundary
- Genuine Auto Parts Boundary
- Michigan Meadow Apartments Boundary
- Michigan Plaza Boundary
- Isoconcentration Contour
- Area of Interest

0 200 400 600 800 1,000
Scale in Feet

Note: This figure is based on source figures Technical Memorandum Analytical and Hydrogeological Evaluation, West Vermont Street Contamination Site, Speedway, Marion County, Indiana, (USEPA, Weston Solutions, Inc. March 27,2011, Figures 15b and 15c)

TITLE
OVERLAY OF FIGURES 15B & 15C - VC ISOCONTOURS
INTERMEDIATE WATER BEARING ZONE
WEST VERMONT STREET CONTAMINATION
SPEEDWAY, MARION COUNTY, INDIANA

CLIENT: *ALLISON TRANSMISSION INC.*
DATE: *Wednesday, June 15, 2011*
FIGURE: *1*
PROJECT NUMBER: *533.42.08*
DRAWN BY: *JAG*

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G:\GIS Projects\GIS Phase I Figure bi\FIGURES\533-42\08\533-42.08_FIG2_VCIsocontoursIntermediateWaterBearingZone.mxd

AOI-19
AOI-27
AOI-26
AOI-28
AOI-25
AOI-32
AOI-31
AOI-51

MW-0202-S3
ND
MW-0210-S3
ND
MW-S3-0601
ND
MW-S3-0501
2.5
MW-0419-S3
ND
ND
MW-0421-S3
ND

MW-302
ND
MW-165D
190
MW-166D
265
MW-13D
260
MMW-14D
84.9
MMW-11D
5.2
MW-168D
128
MW-167D
24.9
MMW-P-10D
2130
1000
MW-170D
128
MMW-P-03D
287
MMW-P-09D
111

4012 COSSELL
13
4031 COSSELL
ND
4018 W. VERMONT
1.6
4140 W. VERMONT
2.1
4042 W. VERMONT
ND

ND
10
100

Olin Park
N Holt Rd
Olin Ave
Grande Ave
N Lyon Ave
N Ryboll Ave
Tomlinson Dr
W North St
W Walnut St
N Luett Ave
N Livingston Ave
N Somerset Ave
N Rochester Ave
W Michigan St
Cossell Rd
Arthur Ave
W Vermont St
Wilcox St
Indianapolis

N

Legend

- GM Allison Transmission Plant Boundary
- Genuine Auto Parts Boundary
- Michigan Meadow Apartments Boundary
- Michigan Plaza Boundary
- Isoconcentration Contour
- Area of Interest

0 200 400 600 800 1,000
Scale in Feet

Note: This figure is based on source figures Technical Memorandum Analytical and Hydrogeological Evaluation, West Vermont Street Contamination Site, Speedway, Marion County, Indiana, (USEPA, Weston Solutions, Inc. March 27,2011, Figures 15b and 15c)

TITLE
VC ISOCONTOURS INTERMEDIATE WATER BEARING ZONE WEST VERMONT STREET CONTAMINATION SPEEDWAY, MARION COUNTY, INDIANA

CLIENT: ALLISON TRANSMISSION INC.
DATE: Friday, July 01, 2011
FIGURE: 2
PROJECT NUMBER: 533.42.08
DRAWN BY: JAG

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